

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA),  
LOSARTAN, and IRBESARTAN PRODUCTS  
LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

**ORDER**

The Court having held a conference call with counsel on December 22, 2020; and this Order intending to confirm the rulings made by the Court that are reflected in the transcript of the proceedings; and accordingly,

It is hereby ORDERED this 31st day of December 2020 as follows:

1. Counsel for ZHP shall promptly advise plaintiffs and the Court whether Mr. Du is available to be deposed in the United States before January 14, 2021. If yes, the Court is inclined to approve ZHP's proposed deposition schedule attached to defendants' December 21, 2020 letter, Exhibit A. If Mr. Du is not available to be deposed prior to the proposed deposition dates of March 18-19, 2021, and if counsel cannot agree on ZHP's deposition dates, the ZHP deposition schedule shall be an agenda item for the scheduled January 13, 2021 conference call.
2. ZHP shall use reasonable good faith efforts to move up the proposed March 2021 dates for ZHP's depositions.
3. Based on counsels' submissions to date, plaintiffs are granted leave to depose Y. Hu, Y. Liu, F. Tang, M. Xu and E. Tasi. ZHP shall promptly provide plaintiffs with proposed dates for their depositions.

4. Based on counsels' submissions to date, leave is granted to depose B. Chen. However, after a sufficient deposition record is developed, ZHP is granted leave to file a Motion for Protective Order to quash Mr. Chen's deposition. Plaintiffs are also granted leave to file a motion requesting production of Mr. Chen's custodial file. ZHP shall provide a proposed date for Mr. Chen's deposition in the event ZHP's motion for protective order is denied.
5. The parties shall serve the agreed upon EU/Israel Addendum to the Deposition Protocol prior to the January 13, 2021 conference call. If disputes exist, they shall be put on the agenda for the January 13, 2021 call.
6. If not resolved beforehand, the parties' dispute regarding the DSCSA shall be put on the agenda for the January 13, 2021 call.
7. By January 15, 2021, plaintiffs are granted leave to file amended complains as to the Losartan and Irbesartan Master Complaints, without prejudice to defendants' right to assert all applicable defenses. All responses to the amended complaints are STAYED pending further Order of the Court.
8. The January 2021 monthly status conference call will be held on January 27, 2021 at 10:00 a.m. All submissions regarding the call shall be served by January 25, 2021.

s/ Joel Schneider  
JOEL SCHNEIDER  
United States Magistrate Judge